

EXHIBIT 2

November 13, 2020

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-- BRIAN STEVENS --

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 13, 2020

TIME: 9:42 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF BRIAN STEVENS, held via Zoom, pursuant to
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

1 -- BRIAN STEVENS --

2 A. The creation of a centralized team
3 focused on verticals.

4 Q. Actually, I want you to look at
5 another document. Well, actually we'll wait
6 because you're not a recipient on this one, so I'm
7 going to ask you a few questions first.

8 At some point in time while Ms. Rowe
9 was still in the office of the CTO, was there a
10 discussion about reorganizing Mr. Grannis' direct
11 reports?

12 A. Not that I'm aware of.

13 Q. Do you recall a discussion about
14 creating a verticals group under Mr. Grannis?

15 A. No, I don't recall that.

16 Q. Do you recall any discussion about
17 Ms. Rowe leading a verticals group under
18 Mr. Grannis?

19 A. No, I don't recall that.

20 Q. That wasn't something that
21 Mr. Grannis discussed with you?

22 MR. GAGE: Objection.

23 A. Not that I recall. Will discusses
24 many things.

25 Q. Okay. And so again if you can just

1 -- BRIAN STEVENS --

2 repeat your answer for how it came to be that

3 Ms. Rowe was moved out of OCTO.

4 A. Diane Greene reassigned Tariq
5 Shaukat, and one of his responsibilities was to
6 lead a central verticals function.

7 Q. Can you tell me what you mean by
8 "central verticals function"?

9 A. Central verticals function meaning
10 lead industry teams focused on certain industry
11 sectors.

12 Q. And so how did that relate to
13 Ms. Rowe being moved out of OCTO?

14 A. There was recognized that people
15 within OCTO had domain expertise within key
16 verticals and were expected to move into a
17 centralized role, centralized group.

18 Q. And who were those individuals who
19 were recognized as having domain expertise?

20 A. From recollection, Ulku, Evren, Ben
21 and Jeff Kemper.

22 Q. And what was the domain expertise
23 that Ulku was recognized as having?

24 A. For financial services.

25 Q. And was that expertise recognized --

1 -- BRIAN STEVENS --

2 recall any other discussions, anything else that
3 either of you said relating to the role generally?

4 MR. GAGE: Objection.

5 A. Yeah, I don't recall how I could have
6 discussed what the role entailed beyond that she
7 wanted to be considered for it.

8 Q. Okay. We're going to turn now to a
9 document that was previously marked as Exhibit 32.
10 And just let me know when you have that up.

11 A. Uh-huh, I have it up.

12 Q. Okay. Great. We're looking at
13 Plaintiff's Exhibit 32, which was previously
14 marked and is Bates stamped GOOG-ROWE-00017410.
15 Do you see this as an exchange between you and
16 Mr. Shaukat in -- around May 8, 2018?

17 A. I see that.

18 Q. Okay. And at the bottom, rolling
19 over to Page 2 is an e-mail from you about moving
20 those in OCTO with industry experience into
21 Tariq's group; do you see that?

22 A. I do see that.

23 Q. And so these are the four people you
24 recollect being discussed in that -- in that
25 context, the four people listed here?